

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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THE ESTATE OF OLIVIA B. GREGGS, by her  
Administrator, CHEYENNE GREGGS,

Plaintiff(s),

**Case No.: 5:23-cv-00412-DNH-ML**

-against-

CLINTON SQUARE OPERATIONS LLC d/b/a  
BISHOP REHABILITATION AND NURSING  
CENTER, SUNNYSIDE CARE CENTER LLC d/b/a/  
SUNNY SIDE CARE CENTER, AART GEURTSSEN,  
M.D., JOHN AND JANE ROES 1-10; JOHN AND  
JANE DOE PHYSICIANS 1-10; RICHARD AND  
JANE ROE NURSES, TECHNICIANS, CAN'S AND  
PARAMEDICAL EMPLOYEES 1-30; ABC  
CORPORATION; ABC PARTNERSHIP (These  
names being fictitious as their true identities are  
presently unknown),

Defendant(s),

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**STIPULATION AND ORDER**

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**IT IS HEREBY STIPULATED AND AGREED**, by and between the attorneys for all parties, that this action be remanded to the Supreme Court of the State of New York, Onondaga County, without costs or fees to any party.

**IT IS FURTHER STIPULATED AND AGREED** that nothing in this Stipulation affects any defense of immunity or defensive preemption under the Public Readiness and Emergency Preparedness Act, 42 U.S.C. §§ 247d-6d, 247d-6e.

**IT IS FURTHER STIPULATED AND AGREED** that Defendant CLINTON SQUARE OPERATIONS LLC d/b/a BISHOP REHABILITATION AND NURSING CENTER's time to

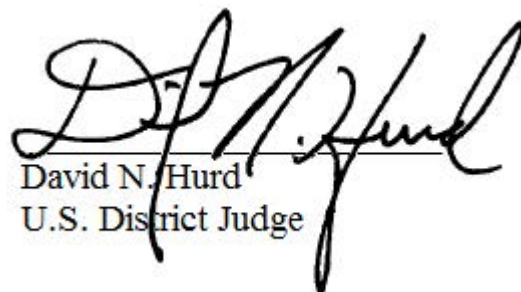
appear, answer, move, or otherwise respond to the Complaint is hereby extended to, and includes, September 30, 2023.

Dated: August 16, 2023

By: /s/ Christopher LoPalo  
Christopher LoPal  
NS PR LAW SERVICES LLC  
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By: /s/ Lori Rosen Semlies  
Lori Rosen Semlies  
WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER, LLP  
*Attorneys for Defendant*  
Clinton Square Operations LLC  
d/b/a Bishop Rehabilitation and  
Nursing Center  
1133 Westchester Avenue  
White Plains, NY 10604

**SO ORDERED**, this 12th day of September, 2023.



David N. Hurd  
U.S. District Judge